



October 12, 2014

Wastewater Branch, Environmental Management Division  
Hawaii State Department of Health  
919 Ala Moana Blvd, Room 309  
Honolulu, HI 96814-4920

**Proposed Revisions to DOH Administrative Rules Title 11, Chapter 62, Wastewater Systems**

To whom this may concern,

With more than 5000 activists and members across the state, the Hawaii Chapters of The Surfrider Foundation strongly support DOH's proposed rule changes prohibiting the installation of any new cesspools in Hawaii and the conversion of cesspools to sewer connections or up grading to individual wastewater systems such as septic systems. The non-point source discharge from cesspools in Hawaii is a serious threat specifically to the protection and enjoyment of coastal waters, and these changes offer a sensible and overdue solution.

The Surfrider Foundation is a non-profit environmental organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through a powerful activist network. With our emphasis on water quality, Surfrider's Chapters across the state supported a legislative bill to deal with the threat of cesspool contamination two years ago, but it didn't pass. From that time onward, we have worked with water quality experts and government officials to support these rule changes.

With about 90,000 across the state, Hawaii has the highest number of cesspools in the country, and almost all of them pose a threat to water resources. Hawaii is also the only state that still allows construction of new cesspools (Rhode Island was the last to ban them almost 50 years ago!). These substandard wastewater systems leach untreated human waste, harmful pathogens and nutrient loads into nearby waters. Cesspools are a leading source of water pollution, and their effluent can contaminate drinking water sources, streams and oceans with disease-causing pathogens, algae-causing nutrients and other harmful substances.

In monitoring the water quality of North Shore beaches on Kauai, the Chapter has seen improvement after the replacement of cesspools at Kauai County beach parks and along the Hanalei River. Enterococcus counts at the beach at the Hanalei Pavilion and at the Hanalei River estuary decreased approximately 56% between 2004 and 2013. Where sewer connections are not available, septic systems are a step forward in protecting public health and the environment. Following the example of Rhode Island, the Department of Health might consider phasing in the replacement schedule to prioritize banning cesspools within 200 feet of the shoreline or waterways because they are the most dangerous.

The proposed revisions to HAR 11-62 are needed because cesspools pose public health and environmental problems, and legislators have been unable to deal with the issue or even prevent new ones from being constructed. Individual homeowners, realtors and developers need to take responsibility for the very negative impact cesspools have upon the environment, public health, tourism, and economic growth in Hawaii. Mahalo for your consideration and leadership in dealing with these water quality issues.

Sincerely,

*Stuart Coleman*

Stuart H. Coleman, Hawaiian Islands Manager

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